

## Questions and Responses on Air Operations Regulations

### 1. ARO/ORO questions related to the 1<sup>st</sup> workshop on the implementation of Air OPS Reg. (EU) 965/2012 (19 March 2014)

No	IR / AMC / GM	Enquiry	Response
1.	Article 2 of the BR	If an aeronautical authority of a EU Member State has in force more stringent rules with respect to Regulation (EU) No 965/2012, for example, specific regulations and circulars these remain valid for the operators of that nation or not?	The implementing rules are directly applicable in all Member States and represent the standard. Article 2.2(f) of the Basic Regulation 216/2008 states that this Regulation and the Implementing Rules (e.g. Air OPS Regulation 965/2012) ensure a 'level playing field in the internal (EU) aviation market'. Article 2.3(d) of the Basic Regulation also states that the Regulations should be uniformly implemented by the national authorities. Art. 14 of the Basic Regulation provides means to be used by Member States to exempt or deviate from the implementing rules or to implement more stringent measures due to safety concerns. The conditions linked to the different Art 14 cases guarantee a fair and equal treatment across the EU. Please also note that the competent authority is expected to put administrative procedures in place, based on the obligations enshrined in Part-ARO. Such procedure could for example concern application time frames. These administrative procedures are only applicable for the operators certified and under the oversight of that authority.
2.	ARO.GEN.120	We would like to better understand the process and approach for the acceptance of Alternate Means of Compliance. How they are approved, time scales, risk analysis and updating of AMC.	The process of AltMOC assessment is addressed in paragraph ARO.GEN.120. It should be noted that this process is under each Member State responsibility and that no time scale is defined in the implementing rules (IR). For AltMOC submitted by an operator, the competent authority is requested, once the AltMOC has been assessed and approved in accordance with the IR, to notify without undue delay the Agency and the other Member State.. The Agency process is being explained during the workshop. It is important to note that the Agency will not approve AltMOC. This is the responsibility of Member States.
3.	ARO.GEN.300	How does the authority manage the risk of runway excursions, where also airport operators' risks have to be assessed?	This question might be better put to the Member States than EASA as it requires actions and oversight on a local level.  In general as required by ICAO, the Member States will establish a State Safety

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		<p>How is mitigating of the Risks (probability x severity) associated with landing of aircraft concretely incorporated in states safety management oversight?</p> <p><u>Motivation:</u> The runway excursion risk for occupants will be reduced by avoiding runway excursions in combination with reducing the effects of an excursion. These risks will not only affect aircraft operators (probability as addressed by the european Action Plan for the Prevention of runway Excursions 1.0) but also airport operators (severity).</p> <p>This will require an integrated oversight of SMS by aircraft operators and airport operators. How is that envisioned?</p> <p><u>Motivation:</u> Separately dealing with this integrated safety risk might not provide the desired reduction of the risk factor. Thus this safety topic requires that Air ops will enjoy integrated oversight with airport oversight.</p> <p>How can the progress of implementation be followed by industry and public? (e.g. yearly EASA status report?)</p>	<p>Programm and will refer to the European Aviation Safety Plan, which is an integral part of the European Aviation Safety Programme, taking into account the European Aviation Safety Plan (EASp), which includes 86 key safety actions to tackle operational, systemic and emerging aviation safety issues for implementation until 2016.</p> <p>The EASp creates a common focus for the entire European aviation community. Through its risk analysis and actions, the EASp is the outcome of an overarching Safety Management System for the European region. It creates a practical link between high-level safety issues and actions to be implemented by States, partner organisations, the aviation industry and EASA itself. This Action Plan, aimed at all providers and users of European aerodromes and all European aircraft operators, is the result of the combined and sustained efforts of organisations involved in all areas of runway operations. Eurocontrol led its development with support from EASA and the <a href="#">European Commercial Aviation Safety Team</a>.</p> <p>The European Aviation Safety Plan (EASp) covering the 2013-2016 period can be downloaded from <a href="#">here</a>. The European Action Plan for the Prevention of Runway Excursions (EAPPRE) can be downloaded from <a href="#">here</a>.</p> <p>Regarding the second part of the question on separately dealing the integrated safety risk, nothing in Part-ARO prevents integrated oversight. On the contrary, Authorities should encourage operators and airports to cooperate in relation to SMS and this is part of their SSP duties (safety promotion) – The EASp provides a framework for this integrated approach.</p>
4.	ARO.GEN.300	Is there a minimum number of ramp and unannounced inspections expected to see by the agent when the agency performs its oversight on the NAA	The current SAFA Directive and Part-ARO.RAMP (AMC1 ARO.RAMP.100(c)(1) General) contain a detailed quota of inspections that should be performed. The Agency performs Standardisation visits regarding the SAFA/SACA programme. Those Standardisation visits also assess the number of RAMP inspections performed by the authority SAFA/SACA inspectors.
5.	GM1 ARO.GEN.300(	GM1 ARO GEN 300 (d) mentioned ‘oversight of persons or organizations established or residing in another member state’: Does the Agency expect an oversight on	ARO.GEN 300 (d) refers to those oversight activities. ARO.GEN.300(d) states that ‘without prejudice to the competences of the Member States and to their obligations as set out in ARO.RAMP, the scope of the oversight of activities

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	b)	such persons and organizations anyway or only when safety hazards and their consequences are identified? If so on which analysis does the agency mean?	performed in the territory of a Member State by persons or organisations established or residing in another Member State shall be determined on the basis of the safety priorities, as well as of past oversight activities.’  The authority as the competent authority should define those safety priorities.
6.	AMC2 ARO.GEN.305(b)	Is the overall supervision and liaison, which is appointed to an (nominated) inspector specifically assigned to the organization to which a certificate has been issued, restricted to the AOC area or to all certificates issued?	Please see AMC2 ARO.GEN.305(b) Oversight programme  PROCEDURES FOR OVERSIGHT OF OPERATIONS  (a) Each organisation to which a certificate has been issued should have an inspector specifically assigned to it. Several inspectors should be required for the larger companies with widespread or varied types of operation. This does not prevent a single inspector being assigned to several companies. Where more than one inspector is assigned to an organisation, one of them should be nominated as having overall responsibility for supervision of, and liaison with, the organisation’s management, and be responsible for reporting on compliance with the requirements for its operations as a whole.
7.	AMC2 ARO.GEN.305(b)	When an organization has more than one certificate. Should the nominated inspector, mentioned in AMC2 ARO.GEN.305(c) the overall responsibility over all certificates be only over the AOC?	The question is understood to refer to an operator who also holds for example a Part-145 or ATO approval. This is a decision of the authority.
8.	ARO.GEN.310 AMC1 ARO.GEN.310(a)	According to SMS implementation: against which implementation level must the NAA accept the SMS system implementation of the organizations? Is this documented, in place or suitable?	<i>Upon receipt of an application for an air operator certificate (AOC), the competent authority should assess the management system and processes, including the operator’s organisation and operational control system. The authority should verify compliance with the rules and, taking into account the organisation of the operator and proposed operation, make an assessment if the management system is suitable for the proposed operation. The true effectiveness of the management system can only be assessed once the operator started its operation.</i>
9.	ARO.GEN.310	Because of the immaturity of the SMS system is an acceptance instead of an approval of the SMS documentation by the NAA’s acceptable for the agency?	The SMS is approved together with the issuance of the AOC. It is then a matter of continuous oversight and authority assessment to determine the maturity and effectiveness of the SMS.

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10.	AMC1 ARO.GEN.310(a)	According to AMC1 ARO.GEN.310 an audit should be performed for verification. Is this also necessary at organizations who have their certificate(s) already under EU-OPS and JAR OPS 3 and (JAR FCL)?	<p>Regarding the transition from EU-OPS/JAR-OPS 2 please refer to Art 7 of the OPS cover regulation and the document explaining the transition, available her (link to website). EU-OPS AOC are grandfathered without further showing of compliance, except for new elements such as the management system.</p> <p>JAR-OPS 3 AOC are converted. Depending on the differences with the new rules, an audit might be necessary. This has to be determined by the competent authority.</p>
11.	ARO.GEN.350	In the case of a fixed wing AOC: may a level 2 finding, raised by the Competent Authority during audits having the scope to verify the implementation of the "Air Ops Regulation", remain open after 28 October 2014 pursuant Art. 7 (1) of 965/2012 Cover Regulation?	<p>This opinion is addressed in the updated transition document prepared by the Commission, discussed in the EASA Committee and will shortly be published on the EASA <a href="#">website</a>. If during normal oversight activities findings against EU-OPS compliance are raised by the NAA, such findings should be closed as far as possible. The authority needs to decide on a case-by-case basis. If a level 2 finding is made one week in advance of 28 October 2014, when the Air OPS Regulation 965/2012 will apply. Corrective action may not be implemented within one week and the finding may be "carried over" to the new AOC provided the authority has sufficient assurance that it will be closed expeditiously. However, there shouldn't be any open findings on the new management system, procedures etc. This means that the operator and authority have not done their job during the transition and so a new AOC should not be issued as compliance cannot be demonstrated.</p>
12.	ARO.GEN.350	How long can the CA extend the level 2 finding for an operator assuming they have submitted a corrective action plan but not completed the corrective action within 3 months of the audit finding?	<p>ARO.GEN.350 (d) (2)(i) states that the authority shall grant the organisation a corrective action implementation period that is appropriate to the nature of the finding and that initially shall not be more than three months. At the end of this period and subject to the nature of the finding, the competent authority may extend the three-month period subject to a satisfactory corrective action plan agreed by the competent authority. ARO.GEN.350 (d) (3) states that where the operator fails to submit an acceptable corrective action plan or to perform the corrective action within the time period accepted or extended by the competent authority, the finding shall be raised to a level 1 finding. This means, 3 + 3 months maximum. In case of a level 1 finding i.a.w. ARO.GEN.350(d)(1) the operator's activities can be limited or prohibited, including an action to suspend or revoke the certificate.</p>

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13.	ARO.OPS.100 Appendix II to Part-ARO	If a company has in its fleet airplanes and helicopters, the aircraft operator's certificate (AOC) will be one or two different one for airplanes and one for helicopters?	There will be one single AOC for an operator having a fleet of aeroplanes and helicopters.
14.	Appendix II to Part-ARO	When an operator has different types or models of aircraft in his fleet, is it acceptable to include all of them together in the "Aircraft model" field of the Operations Specification (ref. Appendix 2 of 965/2012), provided that commercial operations, area of operation, special limitations and specific approvals are the same for all types/models? Or, for specific approvals, is it possible to take advantage of the "Remarks" field to specify those aircraft types/models or registration marks to which a specific approval does not apply?	Footnote Number 6 of the OPSSPECS form of Appendix II to Part-ARO states that the remarks section should list the exact registration marks in case not all specific approvals apply to the aircraft model. In accordance with this footnote, the registration marks can also be listed in the Operations Manual (OM), but in this case the OPSSPECS must include a reference to the page in the OM, where the registration marks are listed.
15.	ORO.AOC.110 ARO.OPS.110	Could you please clarify EASAs position in regards to approval/notification required for wet-leases between EU operators? Does the wet-lease-out operator need prior approval of his competent authority or is notification sufficient? Does the wet-lease-in operator need prior approval of his competent authority or is notification sufficient? How are short-term requirements handled, what timeframe is "short-term"? What will happen on "out of office hours" of the authority in case approval is required for short term needs?	The rule is very clear. An approval is required in all cases except wet-lease out. In case of wet lease between EU operators prior approval means that the competent authority verifies compliance with the applicable rules for continuing AW and OPS [ARO.OPS.110(a)(4)]. However, as for EU operators compliance has already been established by another MS, it would in principle not be necessary to perform a safety assessment of the lessee. In normal circumstances it should be enough to assess reports on ramp inspections performed on aircraft of the lessor (AMC1 ARO.OPS.110). Further details are to be discussed with the national authority.
16.	ORO.AOC.110 (f)	How to implement ORO.AOC.110 (f) in case we intend to wet lease-out for ad-hoc flights (with short notice) f.ex. during the weekend?	It should be noted that in the specific case of wet-leasing out an aircraft, no prior approval is required. The competent authority only needs to be notified by sending the elements listed in AMC1 ORO.AOC.110(f). Details of such process are to be agreed with the competent authority.
17.	ORO.AOC.125	In an attempt to standardise the implementation and general handling of ORO.GEN.AOC.125 can EASA please elaborate on guidelines for such an approval with regard	This provision addresses the use of aircraft listed in the OPSPECS of an AOC holder for non-commercial operations. It basically states that the AOC holder has

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		<p>to potential differences (compared to commercial operations) in for example these areas:</p> <ul style="list-style-type: none"> <li>• Performance (take-off and landing).</li> <li>• ETOPS.</li> <li>• Flight Time Limitations.</li> <li>• Pilot maximum age of 65.</li> <li>• Single pilot versus dual pilot.</li> <li>• Other.</li> </ul> <p>In other words: What could/should be considered acceptable in these areas?</p>	<p>to identify the applicable requirements and get a prior approval from its competent authority for ira procedures. It is considered that for these operations the operator will have to meet at least Part-NCC requirements.</p> <p>For your information, the Agency is processing a new rulemaking task addressing non-revenue flights (RMT.0352/353). <a href="#">Here</a> is a link to the Terms of Reference of this rulemaking task.</p>
18.	ORO.AOC.135	<p>What is the minimum number of persons an organization may have (AOC and ATO)? According to GM1 ORO.AOC.135(a) it can be one, this seems not the case within Part FCL. Why is there a difference between those regulations?</p>	<p>Response will be provided.</p>
19.	ORO.GEN.200	<p>Is it acceptable for CAT operators having a single Quality System integrated for both AOC and CAMO approvals, to refer to Compliance Monitoring System/Programme/Manual and Compliance Monitoring Manager in the CAME, instead of Quality System/Assurance Programme/Manual and Quality manager, to avoid unnecessary duplication of organisation structures, keeping the specific related procedures and processes required by Part M unchanged (only reference to the terms used by the new Air Ops regulation)?</p>	<p>The compliance monitoring manager is indeed the equivalent of the quality manager, as it was required by EU-OPS, and its responsibilities are encompassing most of the responsibilities of the quality manager. The intent of this modification was to ensure that the compliance monitoring function would be fully integrated in the management system and to avoid that a second organisation system is created.</p> <p>In the specific case of CAMO approval, M.A.712 (e) clarifies that <i>“In case of commercial air transport the M.A. Subpart G quality system shall be an integrated part of the operator’s quality system.”</i> In conjunction with Part-ORO, this should be understood as ‘an integrated part of the operator’s management system’. It is therefore understood that the CAMO quality system must be integrated in the operator’s compliance monitoring function. Therefore, it is acceptable to use the Part-ORO terminology in the CAME.</p>
20.	ORO.GEN.200	<p>In case of more operators belonging to the same holding group, with a common accountable manager and similar procedures and type of activities, is it acceptable to have a single Management System with a single safety</p>	<p>This should be assessed by each competent authority as the response depends on a number of factors. It is considered that Regulation (EU) No 965/2012 does not prevent such a scenario in principle. As regards implementation it is important to clearly identify accountabilities and responsibilities. In case of a</p>

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		manager and joint SAG?	holding, additional complexity is created by the different interfaces between the single operators, which need to be carefully managed to ensure the single system properly captures all related risks.
21.	ORO.GEN.200	<p>Operators have asked us why they need to change from the previous requirement for a Quality (Management) System to Compliance monitoring. To them this entails unnecessary work rewriting manuals and making changes to an established and hopefully functioning system, and we as authority will have to spend time reviewing it.</p> <p>To better understand what improvement EASA expects to see with this change, would it be possible to have a brief explanation of the significance of and motivation for moving from "Quality system" to "Compliance monitoring function"?</p> <p>1) What are the benefits of this change and what important differences should we be looking for when reviewing it? Or is this just a change in terminology?</p> <p>2) As many operators will have to have a QMS anyway, e.g. to be qualified to bid for contracts and to comply with other regulations, may we consider one QMS that also covers the compliance monitoring elements of ORO as one way of complying with the requirement?</p> <p>3) Does EASA agree that an adequately implemented ISO 9001 based QMS could be one means of satisfying the "compliance monitoring function" requirement?</p> <p>4) Or is EASA aware of a standard or similar for Compliance Monitoring which may be recommended to operators and authorities?</p>	<p>1) It is indeed considered that compliance monitoring function is indeed the equivalent of the quality management function as it was required by EU-OPS.</p> <p>Quality is a broad term and operators will have certainly also implemented a system to monitor the quality of their service, punctuality, etc. It was felt that there is a need to stress that the safety rules address only the compliance monitoring aspect with the rules and company procedures. Other quality aspects are outside this remit and to be dealt with under the sole discretion of the operator. The intent of this modification was also to ensure that the compliance monitoring function would be fully integrated in the management system so as to avoid several different management systems in parallel</p> <p>2) ORO.GEN.200 is built to foster the implementation of an integrated management system. Safety management and compliance monitoring are the 2 functions provided by the Air OPS rules. There is no doubt that the operator will have other management systems that are to be integrated and that could/should be part of this structure.</p> <p>3)4) So far, Regulation (EU) No 965/2012 doesn't give direct credit in the area of management system to an operator holding a certification according to an industry standard. Regulation (EU) No 965/2012 foresees some possible credit to operators certified against an industry standard only in the area of oversight and not during the initial certification process. Indeed, based on certain conditions listed in AMC1 ARO.GEN305(b);(c), the competent authority may adapt its oversight programme in order to avoid duplication of specific audit items. One of these conditions is that the certification audits (related to the industry standard) are relevant to the requirements defined in Part-ORO and the other Annexes of regulations (EU) No 965/2012.</p> <p>The Agency has not conducted yet any gap analysis between Regulation (EU) No 965/2012 and any organisational industry standard used by operators. We expect the owners of these standards to provide such gap analysis. This would enable EASA but also the competent authority to determine under which conditions</p>

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			these standards could be accepted as acceptable or alternative means of compliance. It would also need to be clarified how continued compliance with the rules is ensured while the standard is being updated. Details of such process are to be agreed with the competent authority.
22.	ORO.GEN.200	According to the regulation, there is a need for Air Operators to provide an Organisation Management System documentation. Based on my experience, some civil aviation authorities (i.e. FOCA) are requiring a single document/manual to be submitted by the Air Operators. My understanding is that Organisation Management System documentation should definitely describe specific organisational functions and safety management activities of a particular organisation, but not necessarily in the form of a single document/manual. Besides, any kind of material duplication should be avoided from Air Operators throughout this process and ref to other existing manuals should be used. Is this true or false? Could you please expand and clarify this issue during the workshop?	As stated in paragraph b) of AMC1 ORO.GEN.200(a)(5): <i>“The operator’s management system documentation may be included in a separate manual or in (one of) the manual(s) as required by the applicable Subpart(s). A cross reference should be included.”</i> It is further described in GM1 ORO.GEN.200(a)(5) that in case an operator chooses to document some of the information in separate documents, it should ensure that manuals contain adequate references to any document kept separately. Detailed implementation issues should be discussed with the competent authority
23.	ORO.GEN.200	The CA FOI appear to have differing views on what is complex and non complex in terms of equipment and size of organization, we would welcome any feedback about complex / non complex organisation.	The determination of the complexity of an operator is addressed in AMC1 ORO.GEN.200(b) containing a number of criteria to be used by the operator. These are the following: <ul style="list-style-type: none"><li>- The FTE (Full time equivalent) criterion (number of Full time employees) is the first one to be checked.<ul style="list-style-type: none"><li>o everything &gt; 20 FTEs is complex by default.</li><li>o Additional considerations:<ul style="list-style-type: none"><li>▪ contracting under the management system of the organisation:<ul style="list-style-type: none"><li>• FTEs of the contractors as relevant to the approval need to be considered in the determination of the total FTE</li></ul></li><li>▪ organisations holding several approvals under the Basic Regulation:<ul style="list-style-type: none"><li>• the sum of the FTEs for each approval is to be considered</li></ul></li></ul></li></ul></li><li>- For operators with 20 FTE or less other than those considered non-complex</li></ul>

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			<p>by default the other “risk” criteria will need to be assessed on a case by case basis. The number, complexity and diversity of aircraft operated and type of operations (CAT, COM, local, standard routes, hostile environment etc ) are all to be considered.</p> <p>The AMC intentionally does not include more specific criteria on the type of operations and complexity of aircraft, as this would make it more difficult to ensure proportionality and many specific cases may fall inbetween the lines. As the implementation of the Air OPS regulation just started, EASA doesn’t have a comprehensive overview yet on how authorities are applying this AMC. It is also to be noted that it could come down to a case by case decision as authorities may also consider additional criteria.</p>
24.	ORO.GEN.205	<p>When contracting any activity under its AOC, no specimen contract wording is available, unlike Part 145. What are the minimum inclusions for a contract satisfying the requirements of the Basic Regulation, the Operators MS and how would, specifically, an operator satisfy its FOI that it is compliant in its audit/surveillance undertakings given the absence of ANY guidance?</p>	<p>It is the operators’ responsibility to understand and establish compliance with the rules. The operator should be capable to identify the necessary elements for such contract. AMC1 ORO.GEN.205 only specifies that a written agreement should exist defining the contracted activities and the applicable requirements. It should be noted nevertheless that:</p> <ul style="list-style-type: none"> <li>- ORO.GEN.205 requires that the contracting organisation, when not certified, shall ensure the competent authority is given access to the contracted organisation,</li> <li>- AMC1 ORO.GEN.205 mentions that the contracted safety related activities should be included in the operator’s safety management and compliance monitoring programmes,</li> <li>- GM2 ORO.GEN.205 emphasizes that the contracting organisation is responsible to ensure that the contracted activities are subject to hazard identification, risk management and compliance monitoring.</li> </ul> <p>Further details are to be agreed with the competent authority.</p>
25.	ORO.GEN.210 ORO.AOC.135	<p>Who of the senior management needs prior approval/acceptance of the NAA?</p>	<p>When initially applying for an AOC iaw ORO.GEN.115 and ORO.AOC.100, the names of the accountable manager and the nominated persons together with their qualifications and experience need to be proposed to the competent authority. In addition, a compliance monitoring function is required by ORO.GEN.200(a)(6). The authority shouldn’t issue an AOC if not satisfied that these persons can fulfill the functions as required by ORO.GEN.210, ORO.AOC.135 or ORO.GEN.200. It then depends on the change management</p>

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			process if a change of postholder is considered a major change requiring authority action or not. This also depends on the size, complexity of the organisation etc and there might also be a difference between nominated persons and CM positions.
26.	ORO.MLR.100	If a company has in its fleet airplanes and helicopters, the operating manual (A, B, C, D) will be only one that includes rules for airplanes and helicopters, or one for airplanes and one for helicopters?	<p>In general, this is a decision of the operator. The objective is to have clear instructions for the crew and other personnel and to avoid any confusion. OM Part B is a type specific manual and therefore a separate OM part B has to be defined for each aircraft type operated. Parts A, C and D could generally be combined. However, it may be advisable to clearly separate for example chapter 8 of OM-A or charts for the aerodromes/operating sites to be used.</p> <p>ORO.MLR.100 paragraph (b) states that <i>“The OM may be issued in separate parts.”</i> and therefore it is considered that the operator has the possibility to split some parts of manuals A, C and D according for example to the type of aircraft operated. Paragraph c) of AMC1 ORO.MLR.100 should also be noted:</p> <p><i>“The OM should be such that:</i></p> <p><i>(1) all parts of the manual are consistent and compatible in form and content;</i></p> <p><i>(2) the manual can be readily amended; and</i></p> <p><i>(3) the content and amendment status of the manual is controlled and clearly indicated.”</i></p> <p>Detailed implementation issues should be discussed with the competent authority.</p>
27.	ORO.MLR.100	Must Ops manuals text refer to the AMC with which they claim compliance? If so, can this be a simple X ref document in the OM?	<p>There is no obligation to cross refer in the OM to EASA AMC.</p> <p>However, a cross reference list might be helpful for the operator and authority to establish compliance with the rules</p>
28.	AMC3 ORO.MLR.100	OM content indicates: 6.1. Crew health precautions (i) blood/bone marrow donation. What is the legal source to document these procedures in OM-A Chapter 6 for bone marrow donation?	<p>The intent of AMC3 ORO.MLR.100 is to detail the minimum content of an operations manual. The objective of this paragraph is to remind crew members on the impact of blood/bone marrow donation on their fitness and to possibly specify a timeframe between such donations and duties. It should include guidance to be followed by the crew in order to avoid any related medical issue which could have a negative impact on safety. It is important to understand that regulatory provisions don't codify every possible risk. It is the operators</p>

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			responsibility to identify these risks and address them for its operations.

## 2. Other questions (Part-CAT, ORO.FTL etc.)

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29.	ORO.FTL	The Commission Regulation N.83/2014 (FTLs) will introduce a possible derogation regarding the minimum rest (ORO.FTL.235) for Air Taxi, Emergency Medical Service and Single Pilot CAT operations. Each Authority will be responsible for assessing the type of operation of the individual Operator. EASA will give directives in order to have a uniform assessment in Europe and then, at the same time, ensure a fair competition between them?	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.
30.	CAT.IDE.H.240	On the Appendix 1 to Jar-OPS 3-005(g) amendment 3 local area operations (vfr day only) on point (9) and (12) we have an exemption of use supplement oxygen for non pressurized helicopter that allow operations prior approval of the authority for excursion of a short duration between 10.000 ft. and 16.000 ft. On the CAT.IDE.H.240 Supplemental oxygen — non-pressurised helicopters it is not reported this exemption except an alleviation for non complex helicopter , is it possible to evaluate the exemptions for HELICOPTER EMERGENCY MEDICAL SERVICE OPERATIONS ?	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.
31.	CAT.IDE.H.220	On CAT.IDE.H220 it is requested that each helicopter is equipped with first aid kit is it possible to consider for Helicopter Emergency Medical Service Operations not a requirement or is it possible to identify the content of the first aid kit as mentioned on the AMC1 CAT.IDE.H.220 in different kits ?	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.
32.	ORO.FTL.105	Operators may plan crew operations from different airports in the same city/state. It is not clear what is intended for LOCATION. At the moment for one operator could be a Country, for another could be a group of cities.	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.

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		<p>Could you confirm the only allowable interpretation is one single (ICAO code) airport location ex: LIML ?  Ex: Home base Milan could mean several airports as Milan Linate, Milan Malpensa and Milan Bergamo because they are considered the same city state: Milan. These three airports are located in three different cities, Milano, Novara and Bergamo, in a busy area of about 100 miles. They can't be considered as one home base (CS FTL.1.200 Home base (a) The home base is a single airport location assigned with a high degree of permanence).</p>	
33.	ORO.FTL.105	<p>Is it allowed create a pilot roster only with "reserve" (ORO.FTL.230)?  Is it allowed automatically modify the off duty day Responses will be provided following the workshop. The question is not related to agenda items of the workshop. following the last day of reserve in one or more duty days? No limits are included in GM1 ORO.FTL.230(a) and CS FTL.1.230.</p>	<p>Responses will be provided following the workshop. The question is not related to agenda items of the workshop.</p>
34.	ORO.FTL.105	<p>'single day free of duty' means, for the purpose of complying with the provisions of Council Directive 2000/79/EC, a time free of all duties and standby consisting of one day and two local nights, which is notified in advance. A rest period may be included as part of the single day free of duty.  Is it allowed to start a reserve duty from midnight if the previous day is day free of duty or a vacation day?</p>	<p>Responses will be provided following the workshop. The question is not related to agenda items of the workshop.</p>
35.	ORO.FTL.105	<p>In case of an abnormal or emergency condition related to a major system failure which determines a return to the stand before take-off, it would not automatically reduce the maximum sector allowance and the maximum daily FDP. This increase Crews workload and could be</p>	<p>Responses will be provided following the workshop. The question is not related to agenda items of the workshop.</p>

No	IR / AMC / GM	Enquiry	Response
		considered a Safety Issues, how the Rulemaker and the NAA could mitigate this problem?	
36.	ORO.FTL.110	Italian NAA allows operators to use “extendible roster” instead of “extended roster”. This doubtful practice permits to program crew roster extension even if the Basic Daily Maximum Flight Duty Period is not exceeded. In this way operators may automatically gain one hour of FDP and crew is forced into a longer daily use. This practice it is not included in the actual legislation and it could be totally out of control by ORO.FTL.205 Flight duty period (FDP) (d). Is this practice allowed with the new rules?	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.
37.	ORO.FTL.240	Any FDP shall include the opportunity to eat and drink in order to avoid a crew member performance detriment but it is not specified a minimum time. Which is the minimum acceptable meal time?	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.
38.	ORO.FTL.240	Could be a concern that pilots consume this eat and drink opportunity when they are performing PF/PM (minimum crew) duties and in the flight deck?	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.
39.	ORO.FTL.105	<p>ORO.FTL.105 Definitions allow at point 10 “duty” and at point 21 “rest period”.</p> <p>With the new rules is it possible for Operators to use “mobile rest days” during the Crews roster construction?</p> <p>Actually this doubtful practice allows to program crews roster with "possible on duty days" (called "mobile rest days" not included in the definitions), instead of use “duty days”, “stand-by” or “reserve”. Those days are usually automatically changed from rest days to on duty days by Operators specially if those days follow the last reserve day</p>	Responses will be provided following the workshop. The question is not related to agenda items of the workshop.

No	IR / AMC / GM	Enquiry	Response
40.	CAT.OP	<p>According to the numbering system for AMC, all AMC, as numbered below, must be complied with. Not possible??</p> <p>AMC1 CAT.OP.MPA.150(b) Fuel policy - fixed wing</p> <p>AMC2 CAT.OP.MPA.150(b) Fuel policy – ERA Aerodrome</p> <p>AMC3 CAT.OP.MPA.150(b) Fuel policy – Helicopters only</p> <p>What we mean here is that the numbering system should perhaps follow convention and be suffixed with A for the AMC applicable to Aero planes and H for Helicopters etc.</p>	<p>This question relates to the numbering system of the AMC.</p>
41.		<p>What plans are there to improve the website; how information is filed, in the search engine etc so that it is less difficult to find information and less likely to miss something of significance?</p>	<p>The Flight Standards department has a <a href="#">Mini</a> website, which includes an updated section of Frequently Asked Questions.</p> <p>The hand outs that have been sent to all participants prior to the workshop contain the relevant hyperlinks to find the Implementing Rules and the consolidated version of the AMC/GM. (Acceptable Means of Compliance/ Guidance Material).</p>